

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:

DANNY JOE WELCH

Debtor.

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Case No. 16-07211-JMC-7

ATTORNEY FEE AFFIDAVIT

*Comes now **Carl Paul Lamb**, an Attorney for Debtor herein, being first duly sworn upon his oath and hereby states as follows:*

1. I make this Affidavit of my own personal knowledge.
2. I am an Attorney admitted to practice law in the State of Indiana and the United States District Court, Southern District of Indiana, and I have been practicing law in the State of Indiana since 1984.
3. Since February 1, 2018 through September 25, 2020, Carl Lamb & Associates, P.C. has billed Thirty Two Thousand Six Hundred Ninety Two Dollars and Fifty Cents **\$32,692.50** in attorney's fees representing, and defending the Danny Welch, against Creditor Rosemary Welch's attempts to collect the Judgment that was issued in Monroe Circuit Court, plenary action, case number, 53C06-0412-PL-02328 (the "Contract Action"). Danny Welch has incurred these attorney's fees from counsel defending him in said Contract Action, in the present bankruptcy action, and in the Adversarial Proceeding involving the same parties, to-wit, Adv. Pro. No. 19-50002.
4. Attached and included herein, as Exhibit "A" is the detailed billing records of attorney's fees incurred by the Debtor since February 1, 2018 through the present.
5. Debtor is requesting that the Court order Creditor Welch to pay the Debtor reasonable attorney's fees in the amount of **\$32,692.50** as a sanction for Creditor Welch's contempt. That Debtor requests said award of attorney's fees to be reduced to a civil judgment with allowable statutory interest.
6. Finding eighteen (18) on page seven (7) of Doc. 26, "Findings of Fact and Conclusions of Law," reads:

“On January 3, 2018, Rosemary again wrote the Plenary Court to seek enforcement of the Judgment in the Contract Action.”

7. Debtor is requesting attorney's fees that have been incurred by the Debtor, since February 1, 2018, because that is date that Debtor began incurring charges for attorney's fees from Carl Lamb & Associates, P.C., as it relates to counsel defending Debtor from Creditor Welch's attempts to collect a debt (the "Judgment") that was discharged in Debtor's bankruptcy case herein that was initially closed on October 11, 2017. As noted herein, after said closing of Danny's bankruptcy, Creditor Welch initiated collection action by writing the Plenary Court to seek enforcement of Judgment on January 3, 2018.
8. Senior attorney, Carl Paul Lamb billed at a rate of Three Hundred Dollars (\$ 300.00) an hour for this matter. Attorney Matt Fox has billed at a rate of Two Hundred Fifty Dollars (\$250.00) an hour for this matter. Paralegal, Angela Lamb has billed at a rate of One Hundred Twenty-Five Dollars (\$125.00) an hour for this matter and Admin has billed at Twenty Dollars (\$20.00) an hour for this matter.
9. I am familiar with the attorney fees customarily charged by Attorneys in the bankruptcy practice areas.
10. The fees charged the debtor in defending him against creditor Rosemary Welch are reasonable.
11. Given the complexity of these proceedings, and the amount of time devoted to the matter by Carl Lamb & Associates, P.C. representing Danny Welch at the State and Federal Court, the requested attorney fee amount of **\$32,692.50** is reasonable and appropriate sanction, given Creditor Welch's contempt, and is consistent with the billing records included and attached herein as Exhibit "A."

FURTHER AFFIANT SAYETH NOT ON THIS 25th DAY OF SEPTEMBER, 2020.

I affirm under penalties for perjury that the above and foregoing is true.

/s/ Carl Paul Lamb

Carl Paul Lamb, Attorney No. #10286-53
Attorney Carl Lamb and Associates
1101 West 2nd Street
Bloomington, Indiana 47403
Telephone: (812) 332-1420
Facsimile: (812) 332-4415

CERTIFICATE OF SERVICE

I, *Carl Paul Lamb*, do hereby certify that a true and accurate copy of the foregoing document has been delivered via e-filing service on the 25th day of September, 2020, addressed to the following: **Jeffrey A Hokanson**, One American Square, Suite 2900, Indianapolis, IN 46282-0200;

/s/ Carl Paul Lamb

Carl Paul Lamb

CARL LAMB & ASSOCIATES, P.C.

1101 West Second Street
Bloomington, Indiana 47403
Telephone: (812) 332-1420
Facsimile: (812) 332-4415
Email: carl@carllamblaw.com

EXHIBIT A

Date	Activity	Duration	Description	Rate	Total	User
Plenary Action						
16-Jan-19	Document Preparation	0.2	drafted email for CPL to send opposing	\$250.00/hr	\$50.00	Matt Fox
16-Jan-19	Meeting	1.1	mtg with CPL	\$250.00/hr	\$275.00	Matt Fox
16-Jan-19	Tx Conf -- Attorney	1.1	Meeting -- Matt Fox -- preparing for phone call with Eric --- Tx Conf -- Eric -- discussing trial strategy --- Tx Conf -- Tracy -- updating her on everything that took place with our call with Eric --- Tx Conf -- Opposing Counsel -- had to leave a detailed voice-mail	\$300.00/hr	\$330.00	Carl Paul Lamb
16-Jan-19	Preparations for Meeting	0.1	prep for call with client and Eric	\$250.00/hr	\$25.00	Matt Fox
21-Nov-18	Tx Conf -- Opposing Counsel	0.1	tx conf with opposing counsel on BK case re objections to 45 day continuance of contempt hearing	\$250.00/hr	\$25.00	Matt Fox
8-Nov-18	Court Appearance	1.2	appeared at hearing on motion to stay	\$250.00/hr	\$300.00	Matt Fox
8-Nov-18	Preparations for hearing	0.5	final hearing prep	\$250.00/hr	\$125.00	Matt Fox
8-Nov-18	Meeting -- Client	1	mtg with Danny and Tracy to prep for hearing and to discuss options, including appeal and settlement	\$0.00/hr	\$0.00	Matt Fox
8-Nov-18	Meeting	1.1	Meeting -- Matt Fox -- preparing for the hearing today --- Meeting -- Tracy and Danny ---	\$300.00/hr	\$330.00	Carl Paul Lamb
8-Nov-18	Meeting	0.4	mtg with cpl are today's hearing	\$0.00/hr	\$0.00	Matt Fox

7-Nov-18	Preparations for hearing	2.8	prep for motion to dismiss hearing	\$250.00/hr	\$700.00	Matt Fox
7-Nov-18	Misc -- Working on various matters	0.3	tx conf with court; drafted Motion for Trial Rule 52a	\$250.00/hr	\$75.00	Matt Fox
7-Nov-18	E-Mail -- Opposing Counsel	0.1	email to Diane re tomorrow's hearing	\$250.00/hr	\$25.00	Matt Fox
7-Nov-18	Preparations for hearing	0.5	prep for hearing on MTD	\$250.00/hr	\$125.00	Matt Fox
7-Nov-18	Tx Conf	0.8	tx conf with Eric and CPL	\$0.00/hr	\$0.00	Matt Fox
7-Nov-18	Tx Conf	1.1	Tx Conf -- Eric -- Indy Counsel -- long conversation about the different angles we plan on taking in the Motion to Dismiss hearing, which is scheduled tomorrow	\$300.00/hr	\$330.00	Carl Paul Lamb
5-Nov-18	Misc -- Working on various matters	0.3	detailed email to CPL re filings in state and fed court	\$250.00/hr	\$75.00	Matt Fox
1-Nov-18	Document Preparation	7.3	finalized memo in response to Plaintiff's Motion to Dismiss	\$250.00/hr	\$1,825.00	Matt Fox
1-Nov-18	Document Preparation	0.8	drafting of reply brief	\$250.00/hr	\$200.00	Matt Fox
1-Nov-18	Document Preparation	2.9	drafting of response to reply brief on motion to dismiss	\$250.00/hr	\$725.00	Matt Fox
31-Oct-18	Tx Conf	0.5	tx conf with Eric re extension of time and pleadings in both state and fed court	\$0.00/hr	\$0.00	Matt Fox
30-Oct-18	Misc -- Working on various matters	0.6	additional edits to motion for order on stay; filing the same	\$0.00/hr	\$0.00	Matt Fox

30-Oct-18	Document Preparation	0.4	finalized motion to rule upon stay or in alternative motion for extension of time	\$250.00/hr	\$100.00	Matt Fox
30-Oct-18	Misc -- Working on various matters	0.4	email to Diane Walker re any objections to motion for ruling on stay and extension of time; updated motion for order on stay	\$250.00/hr	\$100.00	Matt Fox
29-Oct-18	Document Preparation	0.3	updated motion for court to rule upon motion to stay or in alternative motion for extension	\$250.00/hr	\$75.00	Matt Fox
29-Oct-18	Document Preparation	0.3	updated motion for order on stay	\$250.00/hr	\$75.00	Matt Fox
27-Oct-18	Document Preparation	1.1	drafted motion for order on motion to stay and for extension of time	\$250.00/hr	\$275.00	Matt Fox
26-Oct-18	Misc -- Working on various matters	0.9	tx conf with clerk for Judge Carr; mtg with cpl and tx conf with Eric	\$250.00/hr	\$225.00	Matt Fox
26-Oct-18	Tx Conf -- Attorney	1	Tx Conf -- Eric Engerbreston -- 317-638-5555	\$300.00/hr	\$300.00	Carl Paul Lamb
24-Oct-18	Misc -- Working on various matters	0.3	mtg with CPL; email to Eric re plan of attack	\$0.00/hr	\$0.00	Matt Fox
18-Oct-18	Finalizing Documents	0.6	Reviewed proposed pleading - - - Meeting - Matt Fox -- reviewing matters related to the Motion for Stay - - - Reviewed and approved "modified" draft of pleading - - - Motion to Stay to be E-Filed today	\$0.00/hr	\$0.00	Carl Paul Lamb
18-Oct-18	Meeting -- Interns	0.6	mtg with Ricki re review of Rosemary's BK petition; mtg with Rachel re nonparty requests for Perrelle	\$250.00/hr	\$150.00	Matt Fox
17-Oct-18	Document Preparation	1.6	drafted motion for stay or alternative motion for enlargement of time	\$250.00/hr	\$400.00	Matt Fox
11-Oct-18	Misc -- Working on various matters	2.7	tx conf with client and Eric and CPL; mtg with CPL	\$0.00/hr	\$0.00	Matt Fox

11-Oct-18	Tx Conf -- Attorney	2	Tx Conf -- Eric (Indy Attorney) -- Discussing the pending case --- Meeting -- Matt Fox -- Associate -- Discussing the course of action (plan of attack) in this case	\$300.00/hr	\$600.00	Carl Paul Lamb
10-Oct-18	Tx Conf -- Client	0.4	tx conf with Tracy	\$0.00/hr	\$0.00	Matt Fox
8-Oct-18	E-Mail	0.3	transferred /emailed files to Eric	\$250.00/hr	\$75.00	Matt Fox
4-Oct-18	Misc -- Working on various matters	0.2	tx conf with Eric Engebretson; tx conf with CPL; mycase message to clients	\$0.00/hr	\$0.00	Matt Fox
4-Oct-18	Tx Conf	0.8	tx conf with clients and CPL	\$0.00/hr	\$0.00	Matt Fox
1-Oct-18	MyCase -- Message	0.3	detailed message to CPL re tx conf with Eric N. Engebretson re AP in BK	\$0.00/hr	\$0.00	Matt Fox
1-Oct-18	Tx Conf	0.5	tx conf with Eric re BK issues	\$250.00/hr	\$125.00	Matt Fox
1-Oct-18	Misc -- Working on various matters	0.5	reviewed pleadings/memo on MTD; mtg with CPL	\$0.00/hr	\$0.00	Matt Fox
27-Sep-18	Tx Conf	0.1	TX CONF Danny re update on case	\$250.00/hr	\$25.00	Matt Fox
27-Aug-18	Court Appearance	0.5	telephonic court appearance on motion to dismiss	\$250.00/hr	\$125.00	Matt Fox
24-Aug-18	Meeting	1	mtg with Danny and Tracy tx conf	\$250.00/hr	\$250.00	Matt Fox
23-Aug-18	Tx Conf	0.1	tx conf with Danny	\$250.00/hr	\$25.00	Matt Fox

23-Aug-18	Tx Conf	1.1	tx conf with Diane Walker	\$250.00/hr	\$275.00	Matt Fox
31-Jul-18	E-Mail -- Opposing Counsel	0.1	detailed email to opposing counsel	\$250.00/hr	\$25.00	Matt Fox
30-Jul-18	E-Mail -- Opposing Counsel	0.1	email to Diane Walker for Rosemary re tx conf to discuss case	\$250.00/hr	\$25.00	Matt Fox
25-Jul-18	Filing	0.1	filed continuance and proposed order	\$250.00/hr	\$25.00	Matt Fox
25-Jul-18	E-Mail	0.3	detailed email to Diane Walker re position on motion to dismiss pro supp	\$250.00/hr	\$75.00	Matt Fox
25-Jul-18	Misc -- Working on various matters	0.2	tx conf with Tracy; emailed Diane Walker re continuance; finalized motion to continue and proposed order	\$250.00/hr	\$50.00	Matt Fox
18-May-18	Tx Conf -- Court	0.1	tx conf with court and client	\$250.00/hr	\$25.00	Matt Fox
17-May-18	Preparations for hearing	0.2	prep for hearing: reviewed CCS and prior orders from court	\$250.00/hr	\$50.00	Matt Fox
19-Mar-18	Meeting	0.2	meeting with CPL	\$0.00/hr	\$0.00	Matt Fox
19-Mar-18	Meeting -- Associate	0.2	Meeting -- Matt Fox -- We put on evidence today / reviewed the actions by the opposing party --requesting an attorney (time to find one) -- further delay by the moving party	\$300.00/hr	\$60.00	Carl Paul Lamb
19-Mar-18	Court Appearance	0.9	appeared at hearing: mtg with clients	\$250.00/hr	\$225.00	Matt Fox
15-Mar-18	Preparations for hearing	0.8	prep for hearing on pro supp/cs/bk	\$250.00/hr	\$200.00	Matt Fox

15-Mar-18	Preparations for hearing	0.5	preparations for hearing;	\$250.00/hr	\$125.00	Matt Fox
13-Mar-18	Filing	0.1	e-filing of general appearance and motion to dismiss	\$250.00/hr	\$25.00	Matt Fox
12-Mar-18	Drafted and Prepared Documents	1.1	drafted notice to court; drafted general appearance; drafted motion to dismiss and fees	\$250.00/hr	\$275.00	Matt Fox
6-Mar-18	Tx Conf	0.1	tx conf with Tracy	\$250.00/hr	\$25.00	Matt Fox
27-Feb-18	Tx Conf	0.2	tx conf with tracey	\$250.00/hr	\$50.00	Matt Fox
19-Feb-18	Admin – Misc.	0.3	set up new file, prepped ACA and took payment; tx conf with client (.5)	\$50.00/hr	\$12.50	Paralegal CLA
19-Feb-18	Meeting	0.9	mtg with Tracy re case: 53C06-0412-PL-02328	\$250.00/hr	\$225.00	Matt Fox
1-Feb-18	Tx Conf – Client	0.4	tx conf with Tracy regarding PL case Rosemary's prosupp attempt/new retainer/DSO issues; tx conf to Joe Ross's office (left vm); tx conf with akl/cpl	\$250.00/hr	\$100.00	Matt Fox
					<u>\$10,337.50</u>	

Bankruptcy Action (includes AP)

Date	Activity	Duration	Description	Rate	Total	User
25-Sep-20	Document Preparation	0.4	drafted attorney's fee affidavit for CPL review	\$250.00/hr	\$100.00	Matt Fox

21-Sep-20	Court Appearance	0.5	appeared at the contempt hearing, mtg with client afterwards	\$250.00/hr	\$125.00	Matt Fox
21-Sep-20	Court Hearing -- Telephonic	2	Preparation for hearing, preparation with client prior to hearing; Contempt Hearing - via telephone - (anticipated time 2.0)	\$250.00/hr	\$500.00	Matt Fox
20-Sep-20	Prep For Court	3.1	preparations for contempt hearing; research re civil contempt	\$250.00/hr	\$775.00	Matt Fox
20-Sep-20	Preparation -- Trial Prep	0.7	prep for contempt hearing	\$250.00/hr	\$175.00	Matt Fox
17-Sep-20	Tx Conf -- Client	0.6	tx conf with client to prep for contempt hearing	\$250.00/hr	\$150.00	Matt Fox
26-Aug-20	Tx Conf	0.7	TX CONF WITH TRACY	\$0.00/hr	\$0.00	Matt Fox
21-Aug-20	Tx Conf	1.1	tx conf with Tracy and CPL	\$0.00/hr	\$0.00	Matt Fox
31-Jul-20	Review of documents	0.2	review of order setting hearing, findings of fact/order	\$250.00/hr	\$50.00	Matt Fox
5-Jun-20	Review of documents	0.1	reviewed Brief of Rosemary	\$250.00/hr	\$25.00	Matt Fox
22-May-20	Tx Conf -- Client	0.4	Updating client on BK filings	\$0.00/hr	\$0.00	Carl Paul Lamb
22-May-20	Document Preparation	2.8	finalized reply brief (4.3 hours)	\$250.00/hr	\$700.00	Matt Fox
22-May-20	Document Preparation	3	drafting reply brief (6 hours)	\$250.00/hr	\$750.00	Matt Fox

21-May-20	Document Preparation	4.7	drafting reply brief; research	\$250.00/hr	\$1,175.00	Matt Fox
21-May-20	Document Preparation	2.8	drafting reply brief	\$250.00/hr	\$700.00	
20-May-20	Document Preparation	0.2	drafting reply brief	\$250.00/hr	\$50.00	Matt Fox
20-May-20	Document Preparation	0.1	drafting reply brief	\$250.00/hr	\$25.00	Matt Fox
19-May-20	Document Preparation	0.7	drafting reply brief	\$250.00/hr	\$175.00	Matt Fox
14-May-20	Meeting	0.4	mtg with interns re research on brief	\$0.00/hr	\$0.00	Matt Fox
7-May-20	MyCase Message to Client	0.1	mycase message to Tracy re deadline	\$0.00/hr	\$0.00	Matt Fox
28-Apr-20	Review of documents	0.4	research; review of Rose's brief	\$250.00/hr	\$100.00	Matt Fox
27-Apr-20	Review File -- Follow-up to Client	0.2	Reviewed Opposing Counsel's Submission - - Reply to Client -- MyCase Response	\$300.00/hr	\$60.00	Carl Paul Lamb
23-Mar-20	Review of documents	0.1	reviewed Defendant's motion for extension of time	\$250.00/hr	\$25.00	Matt Fox
10-Mar-20	E-Mail --SETTLEMENT OFFER SENT	0.1	E-Mail --Opposing Counsel -- Sent a Settlement Offer in the case (agree the debt is dischargeable and pay ---)	\$300.00/hr	\$30.00	Carl Paul Lamb
9-Mar-20	Court Appearance	4.5	Travel to/from Court: Meeting with client and wife prior to hearing; Court Appearance	\$300.00/hr	\$1,350.00	Carl Paul Lamb

9-Mar-20	Tx Conf -- Client	1.7	tx conf with client and cpl	\$0.00/hr	\$0.00	
9-Mar-20	Preparation -- Trial Prep	3.3	prep for trial; outlines; trial notebook; research	\$250.00/hr	\$825.00	Matt Fox
9-Mar-20	Trial Preparation	6	Preparation for Trial --- Prepared Outlines for Trial Examination --- Tx Conf -- Tracy and Danny Welch -- Preparing for Trial	\$300.00/hr	\$1,800.00	Matt Fox
8-Mar-20	Trial Preparation	0.8	outline prep for trial	\$250.00/hr	\$200.00	Carl Paul Lamb
8-Mar-20	Preparation -- Trial Prep	3	printing and organizing 4. exhibit binders (25 exhibits, 220 pages per binder)	\$250.00/hr	\$750.00	Matt Fox
5-Mar-20	Meeting -- Client	2.5	Meeting --- Client (Telephonically) and Tracy (Wife) --- Preparing for Trial	\$300.00/hr	\$750.00	Matt Fox
4-Mar-20	Preparation -- Trial Prep	3.1	drafted final exhibit list; prep exhibits for trial	\$250.00/hr	\$775.00	Carl Paul Lamb
3-Mar-20	Trial Preparation	1.3	trial prep; drafting outlines; organizing facts	\$250.00/hr	\$325.00	Matt Fox
3-Mar-20	Trial Preparation	0.9	trial prep/ organizing exhibits	\$250.00/hr	\$225.00	Matt Fox
3-Mar-20	Meeting	0.2	mtg with CPL re trial	\$0.00/hr	\$0.00	Matt Fox
3-Mar-20	Trial Preparation	0.9	preparing /organizing trial exhibits	\$250.00/hr	\$225.00	Matt Fox
2-Mar-20	Meeting -- Client	2.1	Meeting -- Danny and Tracy -- Preparation for Trial	\$300.00/hr	\$630.00	Matt Fox
						Carl Paul Lamb

2-Mar-20	Trial Preparation	1.2	mtg with cpl and danny	\$0.00/hr	\$0.00	Matt Fox
2-Mar-20	Preparation -- Trial Prep	0.5	prep for trial; tx conf with opposing counsel	\$250.00/hr	\$125.00	Matt Fox
23-Dec-19	MyCase -- Comment -- Posted Comment	0.1	Mycase message to opposing counsel sharing discovery	\$250.00/hr	\$25.00	Matt Fox
23-Dec-19	Finalizing Documents	0.1	Emailed opposing; finalized responses to discovery	\$250.00/hr	\$25.00	Matt Fox
23-Dec-19	Document Preparation	2.1	finalized Danny's responses to : 1. RFAs 2. Interrogatories 3. Request for Production	\$250.00/hr	\$525.00	Matt Fox
18-Dec-19	Review -- Discovery Requests	0.5	Reviewed Tracy's detailed summary of "key" provisions from Rosemary's deposition	\$300.00/hr	\$150.00	Carl Paul Lamb
12-Dec-19	Meeting -- Client	1.2	Meeting -- Working on discovery responses with Tracy and Danny - (Matt present and working with us)	\$300.00/hr	\$360.00	Carl Paul Lamb
12-Dec-19	Meeting	0.5	Mtg with cpl and clients	\$0.00/hr	\$0.00	Matt Fox
12-Dec-19	Meeting	0.8	Meeting with Danny and Tracy to work on discovery responses	\$250.00/hr	\$200.00	Matt Fox
22-Nov-19	Document Preparation	0.3	drafted motion for continuance of bench trial and motion for continuance of contempt hearing	\$250.00/hr	\$75.00	Matt Fox
14-Nov-19	Misc -- Working on various matters	0.2	tx conf with Tracy; email to Jeff Hokanson	\$250.00/hr	\$50.00	Matt Fox
11-Nov-19	MyCase -- Message	0.1	short mycase message to Tracy re transcript	\$0.00/hr	\$0.00	Matt Fox

20-Sep-19	Deposition	4.3	Prep -- Deposition ---- Deposition -- Rosemary ---- Discussion - Post-Deposition	\$300.00/hr	\$1,290.00	Carl Paul Lamb
20-Sep-19	Preparation -- Deposition	1	Final prep of deposition exhibits (discounted .4 hours)	\$250.00/hr	\$250.00	Matt Fox
19-Sep-19	Tx Conf -- Client	1.3	Tx Conf -- Client (Tracy and Danny) -- Reviewed anticipated Deposition Exhibits and Questions --- Post-TX CONF -- Reviewed (again) Matt's Trial Court Brief and cases (1 hours --- NO CHARGE) ---- Total Time 2.3 Hours / Discount 1.0 hours	\$300.00/hr	\$390.00	Carl Paul Lamb
19-Sep-19	Tx Conf	0.5	tx conf with CPL re deposition	\$0.00/hr	\$0.00	Matt Fox
19-Sep-19	Review of documents	1.1	review of prior filings, pleadings and memorandums	\$0.00/hr	\$0.00	Matt Fox
19-Sep-19	Document Preparation	2	preparation of outline for deposition of Rosemary Welch (discounted 1.3 hours)	\$250.00/hr	\$500.00	Matt Fox
19-Sep-19	Preparation -- Deposition	0.9	prep for deposition; printing/organizing exhibits	\$250.00/hr	\$225.00	Matt Fox
15-Aug-19	Meeting	1.5	mtg with client and CPL	\$0.00/hr	\$0.00	Matt Fox
15-Aug-19	Meeting -- Client	1.5	Meeting -- Danny and Tracy -- Working on the deposition of the Opposing Party for next week - - - 1.8 hours / discount to 1.5 hours	\$300.00/hr	\$450.00	Carl Paul Lamb
6-Aug-19	Misc -- Working on various matters	0.2	email to opposing; mtg with CPL	\$250.00/hr	\$50.00	Matt Fox
6-Aug-19	Document Preparation	0.7	drafted subpoena duces tecum	\$250.00/hr	\$175.00	Matt Fox
17-Jul-19	Misc -- Working on various matters	0.1	email to opposing re depositions and discovery; mycase message to Rose	\$250.00/hr	\$25.00	Matt Fox

16-Jul-19	MyCase -- Comment -- Posted Comment	0.1	mycase message to cpl re depositions	\$0.00/hr	\$0.00	Matt Fox
9-Jul-19	Document Preparation	1	drafting production of documents	\$250.00/hr	\$250.00	Matt Fox
24-Jun-19	Tx Conf	0.5	tx conf with Tracy (discounted to .5 hours)	\$250.00/hr	\$125.00	Matt Fox
17-Jun-19	Drafted and Prepared Documents	1	tx conf with Tracy; drafting discovery questions	\$250.00/hr	\$250.00	Matt Fox
9-Jun-19	Tx Conf	0.2	tx conf with Tracy	\$250.00/hr	\$50.00	Matt Fox
29-May-19	Tx Conf	0.3	tx conf with Tracey	\$250.00/hr	\$75.00	Matt Fox
25-Apr-19	Tx Conf -- Client	0.2	tx conf with Tracy re discovery questions	\$250.00/hr	\$50.00	Matt Fox
19-Apr-19	Tx Conf	0.2	tx conf with Tracy	\$250.00/hr	\$50.00	Matt Fox
16-Apr-19	Review File -- Follow-up to Client	0.3	Reviewed File -- - Meeting - Matt Fox -- Discussing the Order provided by Tracey and it's potential impact to the BK case	\$300.00/hr	\$90.00	Carl Paul Lamb
10-Apr-19	Misc -- Working on various matters	0.2	reviewed docket on BK case, email to opposing, mycase message to client	\$250.00/hr	\$50.00	Matt Fox
10-Apr-19	Tx Conf -- Client	0.1	tx conf with Tracy re case	\$250.00/hr	\$25.00	Matt Fox
25-Mar-19	Court Appearance	0.4	tx conf with court	\$250.00/hr	\$100.00	Matt Fox

4-Mar-19	Document Preparation	0.2	drafted continuance; email to opposing	\$250.00/hr	\$50.00	
						Matt Fox
25-Feb-19	Document Preparation	0.2	updated and finalized answer to counterclaim per CPL review/comment	\$250.00/hr	\$50.00	
						Matt Fox
24-Feb-19	Review of documents	0.1	Reviewed Proposed Answer and Affirmative Defenses - - - MyCase Message -- Matt Fox - directed to make some minor modification then file Answer	\$300.00/hr	\$30.00	
						Carl Paul Lamb
21-Feb-19	Document Preparation	0.8	continued drafting answer to counterclaim and affirmative defense	\$250.00/hr	\$200.00	
						Matt Fox
21-Feb-19	Drafted and Prepared Documents	0.4	drafting of Answer; Affirmative Defenses to Counterclaim	\$250.00/hr	\$100.00	
						Matt Fox
21-Feb-19	Tx Conf	0.5	tx conf CPL and Eric Engerbreston	\$0.00/hr	\$0.00	
						Matt Fox
21-Feb-19	Tx Conf	0.5	Tx Conf - Eric -- 317-638-5555 -- Discussing where we are on the case / where we are going / roles all attorneys will play	\$300.00/hr	\$150.00	
						Carl Paul Lamb
18-Jan-19	Document Preparation	0.2	drafted continuance	\$250.00/hr	\$50.00	
						Matt Fox
14-Jan-19	E-Mail	0.1	2 emails to CPL	\$0.00/hr	\$0.00	
						Matt Fox
14-Jan-19	Misc -- Working on various matters	0.4	tx conf with Tracy; tx conf with Eric; emailed complaint and stay order to Eric	\$250.00/hr	\$100.00	
						Matt Fox
9-Jan-19	Finalizing Documents	0.1	finalized correspondence to trustee	\$250.00/hr	\$25.00	
						Matt Fox
2-Jan-19	MyCase -- Message to Client	0.1	MyCase Message -- Clients -- Requesting immediate filing fee payment / requesting a meeting to review continued legal representation on the Adversarial and State Court action	\$0.00/hr	\$0.00	
						Carl Paul Lamb

28-Dec-18	Finalizing Documents	0.7	finalizing complaint to determine dischargeability	\$250.00/hr	\$175.00	Matt Fox
27-Dec-18	Document Preparation	0.7	finalized adversarial complaint	\$250.00/hr	\$175.00	Matt Fox
27-Dec-18	Document Preparation	1.2	continued drafting of adversarial complaint	\$250.00/hr	\$300.00	Matt Fox
27-Dec-18	Document Preparation	0.8	drafting complaint	\$250.00/hr	\$200.00	Matt Fox
9-Dec-18	Tx Conf – Client	0.3	tx conf with tracy and cal	\$0.00/hr	\$0.00	Matt Fox
31-Oct-18	Research	0.7	research DSO	\$0.00/hr	\$0.00	Matt Fox
31-Oct-18	Research and Preparations for Hearing	0.8	reviewed Eric's PPT on DSO	\$0.00/hr	\$0.00	Matt Fox
31-Oct-18	Misc – Working on various matters	0.2	tx conf to Suzette at Judge Carr's office; email to Eric	\$250.00/hr	\$50.00	Matt Fox
29-Oct-18	Drafted and Prepared Documents	0.9	updated motion for contempt per Eric's comments	\$250.00/hr	\$225.00	Matt Fox
29-Oct-18	Drafted and Prepared Documents	0.3	updated motion for extension per Eric's advice	\$250.00/hr	\$75.00	Matt Fox
29-Oct-18	Drafted and Prepared Documents	0.3	updated motion for extension	\$250.00/hr	\$75.00	Matt Fox
29-Oct-18	Document Preparation	0.4	updated motion for contempt	\$250.00/hr	\$100.00	Matt Fox

27-Oct-18	Document Preparation	0.7	drafted extension of time to file adversarial complaint	\$250.00/hr	\$175.00	
						Matt Fox
26-Oct-18	Document Preparation	1.9	drafted motion to find Rosemary in Contempt for Violating Discharge Injunction	\$250.00/hr	\$475.00	
						Matt Fox
17-Oct-18	Misc -- Working on various matters	0.2	reviewed order to reopen case; email to Diane Walker re any objections to motion to stay / enlarge	\$0.00/hr	\$0.00	
						Matt Fox
3-Oct-18	Tx Conf -- Former Client	1	Tx Conf -- Matt Fox -- -- Tx Conf -- Tracy and Danny -- Reviewing all aspects of the pending Pro Sup and technical issues with the bankruptcy	\$0.00/hr	\$0.00	
						Carl Paul Lamb
31-Jul-18	E-Mail	0.1	email to Diane Walker re PL case and her request for pay advices	\$250.00/hr	\$25.00	
						Matt Fox
					\$22,355.00	
	<u>Summary</u>		BK Fees	\$22,355.00		
			PL Fees	\$10,337.50		
			Total Fees:	\$32,692.50		